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16 *Attorneys for Defendant Zuffa, LLC, d/b/a*
Ultimate Fighting Championship and UFC

17
18 UNITED STATES DISTRICT COURT

19 DISTRICT OF NEVADA

20 Cung Le, Nathan Quarry, Jon Fitch, on behalf
21 of themselves and all others similarly situated,

22 Plaintiffs,

23 v.

24 Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,

25 Defendant.

Lead Case No.: 2:15-cv-01045-RFB-
(PAL)

Member Case Nos.:

2:15-cv-01046-RFB-(PAL)

2:15-cv-01055-RFB-(PAL)

2:15-cv-01056-RFB-(PAL)

2:15-cv-01057-RFB-(PAL)

26 **DECLARATION OF PERRY M.**
27 **GROSSMAN IN SUPPORT OF ZUFFA,**
28 **LLC'S [PROPOSED] PROTECTIVE**
ORDER

1 Luis Javier Vazquez and Dennis Lloyd
2 Hallman, on behalf of themselves and all
others similarly situated,

3 Plaintiffs,

4 v.

5 Zuffa, LLC, d/b/a Ultimate Fighting
6 Championship and UFC,

7 Defendant.

Case No. 2:15-cv-01055 RFB-(PAL)

8 Brandon Vera and Pablo Garza, on behalf of
9 themselves and all others similarly situated,

10 Plaintiffs,

11 v.

12 Zuffa, LLC, d/b/a Ultimate Fighting
13 Championship and UFC,

14 Defendant.

Case No. 2:15-cv-01056 RFB-(PAL)

15 Gabe Ruediger and Mac Danzig, on behalf of
16 themselves and all others similarly situated,

17 Plaintiffs,

18 v.

19 Zuffa, LLC, d/b/a Ultimate Fighting
20 Championship and UFC,

21 Defendant.

Case No. 2:15-cv-01057 RFB-(PAL)

22 Kyle Kingsbury and Darren Uyenoyama, on
23 behalf of themselves and all others similarly
situated,

24 Plaintiffs,

25 v.

26 Zuffa, LLC, d/b/a Ultimate Fighting
27 Championship and UFC,

28 Defendant.

Case No. 2:15-cv-01046 RFB-(PAL)

1 I, PERRY M. GROSSMAN, declare as follows:

2 1. I am over 21 years old and have personal knowledge of the information in this declaration.

3 I am a member of the bar of the State of California, and an associate with Boies, Schiller &
4 Flexner LLP, counsel for Zuffa, LLC (“Zuffa”). I have personal knowledge of the facts stated in
5 this declaration and if called to testify, I would and could competently testify to those facts.

6 2. On August 27, 2015, I accessed the website of Warner Angle Hallam Jackson &
7 Formanek and viewed the biography of Robert C. Maysey, which is posted at the following
8 address: <http://www.warnerangle.com/attorneys/maysey.htm>. Exhibit A is a true and correct copy
9 of that web page.

10 3. On August 27, 2015, I accessed the public facebook.com page titled “MMAFA // Mixed
11 Martial Arts Fighters Association,” and viewed the “About” tab, which is posted at the following
12 address: https://www.facebook.com/TheMMAFA/info?tab=page_info. Exhibit B is a true and
13 correct copy of that web page.

14 3. On August 27, 2015, I accessed the web site of the Mixed Martial Arts Fighters
15 Association and viewed the “FAQ” page, which is posted at the following address:
16 <http://mmafa.tv/faq-2/>. Exhibit C is a true and correct copy of that web page.

17 4. On August 27, 2015, I accessed the web site MMAPayout.com, and viewed an article
18 titled, “Maysey Further Explains Benefits of MMAFA,” which is posted at the following address:
19 <http://mmapayout.com/2009/07/maysey-further-explains-benefits-of-mmafa/>. Exhibit D is a true
20 and correct copy of that web page.

21 5. On August 27, 2015, I accessed the web site ESPN.com, and viewed an article titled,
22 “Fighters claim UFC restricts earnings,” which is posted at the following address:
23 [http://espn.go.com/mma/story/_/id/12037883/antitrust-lawsuit-filed-ufc-parent-company-claims-](http://espn.go.com/mma/story/_/id/12037883/antitrust-lawsuit-filed-ufc-parent-company-claims-monopoly)
24 [monopoly](http://espn.go.com/mma/story/_/id/12037883/antitrust-lawsuit-filed-ufc-parent-company-claims-monopoly). Exhibit E is a true and correct copy of that web page.

25 5. On August 27, 2015, I accessed the web site twitter.com, and viewed the Twitter feed for
26 the Twitter account @MMAFA, which is linked to user Rob Maysey and posted at the following
27 web address: <https://twitter.com/mmafa>. I viewed a tweet on this feed that was dated: “11:54 PM
28 – 18 Aug. 2015” and which appears on the following web page:

1 <https://twitter.com/MMAFA/status/633909903850008577>. Exhibit F is a true and correct copy of
2 the web page for the August 18, 2015, 11:54 PM. tweet.

3 * * *

4
5 I declare under penalty of perjury that the foregoing is true and correct. Executed this
6 27th Day of August 2015 in Oakland, California.
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8
9 /s/ Perry M. Grossman
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